RECEIVED

## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

APR 19 3 24 PM '00

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

## MAIL ORDER ASSOCIATION OF AMERICA DESIGNATION OF INTERROGATORY RESPONSES AS WRITTEN CROSS EXAMINATION OF USPS WITNESS MAYES (USPS-T-32) AND MOTION FOR ORAL CROSS-EXAMINATION

The Mail Order Association of America (MOAA) moves for leave to engage in oral cross-examination of witness Mayes. The purpose of the cross-examination will be to follow-up on responses to interrogatories.

The MOAA designates the following as its written cross-examination of witness Mayes. Two copies of each designated interrogatory and witness Mayes's responses are attached.

Val-Pak/Carol Wright UP-CW/USPS-T32-1, 3, 12-15

Mail Order Association of America MOAA/USPS-T-32-1, 2, 4-6, 8-10, 12, 13

Newspaper Association of America NAA/USPS-T32-2-30

Greeting Card Association GCA/USPS-T32-1-10

Association of American Publishers AAP/USPS-T32-1-2, 4, 9-12

Association of Alternate Postal Systems AAPS/USPS-T32-4-6, 11, 17, 19

Office of the Consumer Advocate OCA/USPS-T32-18

Respectfully submitted,

David C. Todd

PATTON BOGGS LLP 2550 M Street, NW

Washington, DC 20037-1350 Telephone: (202) 457-6410

Counsel for Mail Order Association of America

## CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served this Designation upon all participants in this proceeding in accordance with Section 12 of the rules of practice this nineteenth day of April, 2000.

David C. Todd

Date: April 19, 2000